

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Yong Woo Choi, individually and
on behalf of all others
similarly situated,

Plaintiff,

ANSWER

-against-

20-CV-857

Rausch, Sturm, Israel, Enerson &
Hornik LLP, d/b/a Rausch Sturm,
Galaxy Asset Purchasing, LLC and
Worldwide Asset Purchasing II
LLC,

Defendants.

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Defendant RAUSCH, STURM, ISRAEL, ENERSON & HORNIK, LLP d/b/a
RAUSCH STURM, by its attorneys, Barron & Newburger, P.C., answers
plaintiff's complaint as follows:

1. Defendant acknowledges being sued pursuant to the Fair
Debt Collection Practices Act, but denies any violation thereof.

2. Defendant admits the allegations contained in paragraph
"2" of the complaint.

3. Defendant admits the allegations contained in paragraph
"3" of the complaint.

4. Defendant admits the allegations contained in paragraph
"4" of the complaint.

5. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "5" of the complaint.

6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant admits the allegations contained in paragraph "7" of the complaint.

8. Defendant admits the allegations contained in paragraph "8" of the complaint.

9. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

10. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

11. Defendant admits the allegations contained in paragraph "11" of the complaint

12. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

13. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

14. Defendant admits the allegations contained in paragraph "14" of the complaint.

15. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

16. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

17. Defendant admits the allegations contained in paragraph "17" of the complaint.

18. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

19. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

20. Defendant admits the allegations contained in paragraph "20" of the complaint.

21. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

22. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

23. Defendant admits the allegations contained in paragraph "23" of the complaint.

24. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

25. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

26. Defendant admits the allegations contained in paragraph "26" of the complaint.

27. Defendant admits the allegations contained in paragraph "27" of the complaint.

28. Defendant admits the allegations contained in paragraph "28" of the complaint.

29. Defendant admits the allegations contained in paragraph "29" of the complaint.

30. Defendant admits the allegations contained in paragraph "30" of the complaint

31. Defendant admits the allegations contained in paragraph "31" of the complaint.

32. Defendant admits the allegations contained in paragraph "32" of the complaint.

33. Defendant admits the allegations contained in paragraph "33" of the complaint.

34. Defendant admits the allegations contained in paragraph "34" of the complaint.

35. Defendant admits the allegations contained in paragraph "35" of the complaint.

36. Defendant denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "36" of the complaint.

37. Defendant denies each and every allegation contained in paragraph "37" of the complaint.

38. Defendant denies each and every allegation contained in paragraph "38" of the complaint.

39. Defendant denies each and every allegation contained in paragraph "39" of the complaint.

40. Defendant repeats and realleges its previous admissions and denials contained in paragraphs "1" through "39" of the complaint.

41. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

42. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

43. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

44. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

45. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

46. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

47. Defendant admits the allegations contained in paragraph "47" of the complaint.

48. Defendant denies each and every allegation contained in paragraph "48" of the complaint.

49. Defendant denies each and every allegation contained in paragraph "49" of the complaint.

50. Defendant denies each and every allegation contained in paragraph "50" of the complaint.

51. Defendant denies each and every allegation contained in paragraph "51" of the complaint.

52. Defendant denies each and every allegation contained in paragraph "52" of the complaint.

53. Defendant denies each and every allegation contained in paragraph "53" of the complaint.

54. Defendant denies each and every allegation contained in paragraph "54" of the complaint.

55. Defendant denies each and every allegation contained in paragraph "55" of the complaint.

56. Defendant denies each and every allegation contained in paragraph "56" of the complaint.

57. Defendant denies each and every allegation contained in paragraph "57" of the complaint.

58. Defendant denies each and every allegation contained in paragraph "58" of the complaint.

59. Defendant denies each and every allegation contained in paragraph "59" of the complaint.

60. Defendant denies each and every allegation contained in paragraph "60" of the complaint.

61. Defendant repeats and realleges its previous admissions and denials contained in paragraphs "1" through "60" of the complaint.

62. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

63. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

64. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

65. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

66. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

67. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

68. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

69. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

70. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

71. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

72. This paragraph contains no factual allegations directed against the answering defendant and does not require an admission or denial.

73. Defendant denies each and every allegation contained in paragraph "73" of the complaint.

74. Defendant denies each and every allegation contained in paragraph "74" of the complaint.

75. Defendant denies each and every contained in paragraph "75" of the complaint.

76. Defendant denies each and every contained in paragraph "76" of the complaint.

77. Defendant denies each and every allegation contained in paragraph "77" of the complaint.

78. Defendant denies each and every allegation contained in paragraph "78" of the complaint.

79. Defendant denies each and every allegation contained in paragraph "79" of the complaint.

80. Defendant denies each and every allegation contained in paragraph "80" of the complaint.

81. Defendant denies each and every allegation contained in paragraph "81" of the complaint.

82. Defendant denies each and every allegation contained in paragraph "82" of the complaint.

83. Defendant denies each and every allegation contained in paragraph "83" of the complaint.

84. Defendant denies each and every allegation contained in paragraph "84" of the complaint.

85. Defendant acknowledges plaintiff's efforts to bring this matter as a class action, but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

86. Defendant acknowledges plaintiff's efforts to bring this matter as a class action, but denies any violation of the FDCPA and denies that this matter is suitable for class certification.

87. Defendant denies each and every allegation contained in paragraph "87" of the complaint.

88. Defendant denies each and every allegation contained in paragraph "88" of the complaint.


89. Defendant denies each and every allegation contained in paragraph "89" of the complaint.

90. Defendant denies each and every allegation contained in paragraph "90" of the complaint.

91. Defendant denies each and every allegation contained in paragraph "91" of the complaint.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY
April 6, 2020



ARTHUR SANDERS, ESQ.
BARRON & NEWBURGER, P.C.
Attorneys for defendant
Rausch, Sturm, Israel,
Enerson & Hornik, LLC, d/b/a
Rausch Sturm
30 South Main Street
New City, NY 10956
845-499-2990

TO:

CRAIG B. SANDERS, ESQ.

BARSHAY SANDES PLLC

Attorneys for plaintiff

100 Garden City Plaza, Suite 500

Garden City, NY 11530

DAVID M. BARSHAY, ESQ.

BARSHAY SANDES PLLC

Attorneys for plaintiff

100 Garden City Plaza, Suite 500

Garden City, NY 11530